

09:42:17 1 Q. Well, just -- yeah, I mean, anybody.

,42:18 2 A. When you say talk about it, do -- what are you

09:42:21 3 referring to? I don't --

09:42:22 4 Q. Well, good question. Let me kind of go back.

09:42:25 5 A. Okay.

09:42:28 6 Q. When you were preparing for -- for today, did

09:42:32 7 you talk to anybody to prepare for your deposition?

09:42:38 8 A. Are you asking did I talk about the -- probably

09:42:39 9 questions or things like that?

09:42:42 10 Q. Well, how did you prepare for today, if you

09:42:42 11 did?

09:42:46 12 A. I just reviewed the interrogatories that I

09:42:49 13 received. That's all I did.

09:42:51 14 Q. Okay. Did you review them with anybody?

09:42:58 15 A. No. No, I didn't.

09:43:03 16 Q. So the -- would it be safe to say that the

09:43:06 17 documents that you reviewed prior to your deposition

09:43:10 18 are the documents that you, through your attorney, sent

09:43:13 19 to me in response to discovery requests?

09:43:15 20 A. That's right.

09:43:17 21 Q. Okay. Was there -- is there any other

09:43:22 22 documents that might be outstanding that you reviewed

09:43:25 23 that were not given to me?

24 A. No.

25 Q. Okay. So everything that we received is all

09:43:28 1 the documentation you have?

09:43:31 2 A. That's it. Right.

09:43:31 3 Q. That's it. Okay. So there's nothing else?

09:43:33 4 A. Nothing else.

09:43:38 5 Q. All right. And can we have an agreement that  
09:43:40 6 if you do find other documents that -- that might be  
09:43:43 7 responsive to those requests or that are related to  
09:43:45 8 this matter, that you would let your attorney know that  
09:43:48 9 so that I could have them?

09:43:50 10 A. Yes, I will.

09:43:52 11 Q. Well, how much time did you spend in preparing  
09:43:56 12 for today, would you say?

09:43:59 13 A. Total amount of time? It -- it was like -- I  
09:44:08 14 would look at the information certain nights and I  
09:44:12 15 might spend 45 minutes to an hour each time. So I  
09:44:16 16 would say between maybe three to five hours, possibly  
09:44:23 17 more. I'm not certain. I didn't really pay attention  
09:44:27 18 to that.

09:44:29 19 Q. Sure. And there's plenty of other more fun  
09:44:33 20 things to be doing.

09:44:37 21 A. Yes.

09:44:34 22 Q. And I think your attorney is looking at your  
09:44:37 23 chair because it's squeaking.

09:44:38 24 A. Oh, that's the chair. I'm sorry.

09:44:40 25 Q. No, it's not your fault.

09:44:41

1 A. I didn't realize I was doing that.

09:44:46

2 MR. WAOBIKEZE: Do you mind if I adjust your  
3 chair?

09:44:48

4 MS. HISEL: No, that's that chair. Would you  
5 -- would you like to switch chair?

09:44:50

6 MR. WAOBIKEZE: No. I thought it was coming  
7 from next door.

09:44:51

8 A. I didn't even hear it. I was just listening to  
9 you.

10 BY MS. HISEL:

09:44:56

11 Q. You were focused.

09:44:57

12 A. I was focused on you.

09:44:58

13 Q. And that's good. All right. So -- so you  
14 would say three to five hours?

09:45:02

15 A. I think, yeah. That's an estimate.

09:45:06

16 Q. Okay. So for any of that time preparing, did  
17 you talk to your attorney?

09:45:09

18 A. No.

09:45:11

19 Q. So your attorney didn't help you prepare in any  
20 way today -- for today's deposition?

09:45:14

21 A. The only -- I had some questions when I went to  
22 the office regarding trying to understand the questions  
23 and that's all.

09:45:27

24 Q. Sure. And really that was for discovery;  
25 right?

09:45:32

1 A. Right.

09:45:33

2 Q. Not so much for today?

09:45:35

3 A. Right.

09:45:36

4 Q. Okay. Well, how did you come to hear about  
5 Mr. Waobikeze?

09:45:41

6 A. I searched and searched and I kept going back  
7 to the website. I just kept searching and reviewing  
8 and looking at it.

09:45:51

9 Q. So you -- you found out about him through the  
10 website, through his firm website?

09:45:58

11 A. Right.

09:45:58

12 Q. And what about that website kind of attracted  
13 you to --

09:46:03

14 A. I don't even recall, to be honest with you,  
15 because at that point, I just needed some help and I  
16 just don't know what it was, to be honest with you  
17 right now.

09:46:14

18 Q. Okay. Who all knows that you are having a  
19 deposition today?

09:46:19

20 A. My sister knows and she's the only one that I  
21 know who would know because --

09:46:25

22 Q. And who is your sister?

09:46:32

23 A. Regina Sanders.

09:46:36

24 Q. And does she live here in San Antonio?

09:46:38

25 A. She lives in Schertz.

09:46:41 1 Q. Okay. Any current or former Judson employees  
J:46:48 2 know that you're taking your deposition today?

09:46:51 3 A. No.

09:46:52 4 Q. That you're aware of?

09:46:53 5 A. Not that I'm aware of.

09:46:56 6 Q. Okay. So did you talk to Virginia Brown about  
09:47:00 7 your deposition today?

09:47:02 8 A. No, I didn't.

09:47:03 9 Q. And who is Virginia Brown?

09:47:05 10 A. She is a teacher assistant there at Woodlake.

09:47:13 11 Q. Is she currently employed at -- in that  
09:47:16 12 position?

J:47:16 13 A. I don't know.

09:47:17 14 Q. Don't know okay. Robin Snyder?

09:47:21 15 A. A former secretary.

09:47:26 16 Q. And did you talk to her about your deposition?

09:47:26 17 A. No.

09:47:30 18 Q. And when you say a former secretary, former  
09:47:34 19 secretary to you when you were employed at Judson?

09:47:36 20 A. Oh, no. I didn't have a secretary. She was  
09:47:39 21 the principal's secretary.

09:47:40 22 Q. Okay. So she would have been Ms. Verna  
09:47:43 23 Ruffin's secretary?

09:47:44 24 A. That's right.

J:47:44 25 Q. Okay. And do you know if she's still there?

09:47:46 1 A. No, she's not. She's been gone for several  
09:47:51 2 years.

09:47:52 3 Q. Okay. Staci Decuir?

09:47:57 4 A. No.

09:48:00 5 Q. And she is a teacher at Judson?

09:48:03 6 A. She's a -- yes.

09:48:06 7 Q. Joyce Sweet?

09:48:10 8 A. No.

09:48:10 9 Q. Didn't talk to her. And is she still a teacher  
10 at Judson?

09:48:10 11 A. To my knowledge, yes.

09:48:13 12 Q. Okay. Dan Garza, did you talk to him?

09:48:17 13 A. No.

09:48:17 14 Q. Do you know if he's still a teacher at Judson?

09:48:21 15 A. No.

09:48:22 16 Q. You don't know?

09:48:23 17 A. No, he's not.

09:48:23 18 Q. He's not?

09:48:23 19 A. Unless he's back there, but no.

09:48:28 20 Q. Marilyn McKinney, did you talk to her about  
09:48:32 21 your deposition?

09:48:33 22 A. No.

09:48:37 23 Q. Okay. And it says that she's a grievance chair  
09:48:39 24 for Judson. Is she still employed with Judson in that  
09:48:43 25 capacity?

09:48:43 1 A. I'm not sure about that capacity, but I think  
09:48:47 2 she's still employed there.

09:48:50 3 Q. Okay. Okay. Are you aware of any  
09:48:56 4 tape-recorded conversation between you and anybody at  
09:49:03 5 Judson?

09:49:04 6 A. No, I'm not.

09:49:06 7 Q. Okay. Do you have any diaries or notes or  
09:49:12 8 memorandums that you kept personally regarding the  
09:49:17 9 subject of this lawsuit or during your time that you  
09:49:20 10 were employed at Judson?

09:49:23 11 A. I think I gave some memorandums to my  
09:49:26 12 attorneys. But as far as diaries, I don't have any  
09:49:28 13 diaries --

09:49:30 14 Q. Okay.

09:49:31 15 A. -- or notes

09:49:31 16 Q. Or journals or anything like that?

09:49:32 17 A. No journals, no. I didn't keep journals or  
09:49:36 18 diaries.

09:49:39 19 Q. All right. Let's kind of look a little bit  
09:49:42 20 about some general background information.

09:49:44 21 Ms. Garrett, where were you born and raised?

09:49:46 22 A. In Alabama.

09:49:48 23 Q. Okay.

09:49:48 24 A. Birmingham.

09:49:52 25 Q. And, Ms. Garrett, are you -- are you married?

09:49:55	1	A. No.
09:49:56	2	Q. Okay. Do you have any children?
	3	A. No.
09:50:02	4	Q. Have you ever been married?
	5	A. Yes.
09:50:05	6	Q. Okay. Are your parents still living?
	7	A. No.
09:50:12	8	Q. Do you have any siblings?
	9	A. Yes.
09:50:16	10	Q. Besides your sister that you mentioned?
09:50:23	11	A. Right.
09:50:23	12	Q. Ms. Sanders?
	13	A. Yes.
09:50:25	14	Q. Is that your only sibling?
09:50:27	15	A. No.
09:50:27	16	Q. Who are your other siblings?
09:50:29	17	A. You want names?
09:50:30	18	Q. Sure.
09:50:30	19	A. Okay. Paulette Richardson.
	20	Q. Okay.
09:50:35	21	A. Betty Garrett, Donna Garrett, and my brother,
09:50:47	22	Charlie Garrett, Jr.
09:50:51	23	Q. And are they all living?
	24	A. Yes.
09:50:54	25	Q. And do they live in San Antonio area?